

**UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

In re: <b>MICHAEL JOSEPH PIPITONE,</b>	:	<b>Chapter 13</b>
Debtor(s),	:	Case No. <b>5:24-bk-00079-MJC</b>
<b>CREDIT ACCEPTANCE CORPORATION,</b>	:	
Movant(s),	:	<b>Answer to Motion for</b>
v.	:	<b>Relief from Stay</b>
<b>MICHAEL JOSEPH PIPITONE and</b>	:	
<b>JACK N. ZAHAROLOULOS, Trustee,</b>	:	
Respondent(s),	:	

**ANSWER TO MOTION OF CREDIT ACCEPTANCE FOR RELIEF FROM STAY**

AND NOW COMES Debtor(s) **MICHAEL JOSEPH PIPITONE**, by and through their attorney, J. ZAC CHRISTMAN, ESQUIRE, and in Answer to the Motion of **CREDIT ACCEPTANCE** for Relief from Stay aver(s):

1. Admitted.
2. Denied to the extent the averments of paragraph 2 are other than statement(s) or conclusion(s) of law or misplaced request(s) for relief that do not require a response.
3. Denied to the extent the documents referenced do not speak for themselves.
- 4A. Admitted.
- 4B. Admitted.
- 4C. Admitted.
- 4D. Admitted in part and Denied in part. Debtor was advised by Movant to make payments online or through their application. Debtor's made payments online, but Movant rejected the payments. Upon information and belief, this was due to the automatic stay. Debtors paid \$440 since the instant Motion was filed.
- 5A. Denied. The lack of payments was caused by Movant's misrepresentation to Debtor and his wife.

WHEREFORE, Debtor(s) **MICHAEL JOSEPH PIPITONE** respectfully prays this Honorable Court for an Order than the Motion of **CREDIT ACCEPTANCE CORPORATION** for Relief from Stay be Denied, and for such other and further relief as the Honorable Court deems just and appropriate.

Respectfully Submitted,

/s/ J. Zac Christman

J. Zac Christman, Esquire  
Attorney for Debtor(s)  
538 Main Street, Suite 102  
Stroudsburg, PA 18360  
(570) 234-3960  
[zac@jzacchristman.com](mailto:zac@jzacchristman.com)